

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Joint Administration Requested)

**DECLARATION OF MOHAMMAD HONARKAR IN SUPPORT OF THE
MOTION OF MOHAMMAD HONARKAR AND 4G WIRELESS, INC. FOR ENTRY OF
AN ORDER DIRECTING THE APPOINTMENT OF
A CHAPTER 11 TRUSTEE PURSUANT TO 11 U.S.C. § 1104(a)**

I, Mohammad Honarkar, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the 100% owner and principal of 4G Wireless, Inc. (“4G”) and, on behalf of myself and 4G, I am authorized to submit and hereby submit this declaration (this “Declaration”) in support of the *Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a)* (the “Motion”) filed contemporaneously herewith in the above-captioned cases.
2. 4G owns 50% of the membership interests in each of the MOM Debtors.
3. I hereby incorporate by reference into this Declaration all of the facts set forth in the Background Section of the Motion as if they were set forth herein in full.

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], and 837 Park Avenue, LLC [3229].

4. Attached hereto as Exhibit 1 is a true and correct copy of the Partial Interim Arbitration Award.²

5. Attached hereto as Exhibit 2 is a true and correct copy of the Pre-Hearing Brief filed by Claimants (myself and 4G) in the arbitration.

6. Attached hereto as Exhibit 3 is a true and correct copy of a chart summarizing the Debtors' organizational structure.

7. Attached hereto as Exhibit 4 are true and correct copies of the following Notices of Default and Election to Sell Under Deed of Trust:

Recording Date	Recorder's Office	Document No.
November 20, 2024	Office of the Assessor-Recorder-Clerk for San Bernardino County, California	2024-0278818
November 20, 2024	Office of the Clerk-Recorder for Orange County, California	2024000304092
December 5, 2024	Office of the Recorder for Los Angeles County, California	20240856622
February 13, 2025	Office of the Clerk-Recorder for Orange County, California	2025000053601
February 13, 2025	Office of the Clerk-Recorder for Orange County, California	2025000053607
February 13, 2025	Office of the Clerk-Recorder for Orange County, California	2025000053611
February 13, 2025	Office of the Clerk-Recorder for Orange County, California	2025000053613
February 13, 2025	Office of the Clerk-Recorder for Orange County, California	2025000053616

8. Attached hereto as Exhibit 5 are true and correct copies of the following Notices of Trustee's Sale:

Recording Date	Recorder's Office	Document No.
February 26, 2025	Office of the Assessor-Recorder-Clerk for San Bernardino County, California	2025-0045072
February 26, 2025	Office of the Clerk-Recorder for Orange County, California	2025000064890

² All capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Motion.

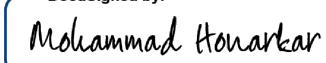
9. Attached hereto as Exhibit 6 is a true and correct copy of the *Declaration of Michael Kluchin in Support of Cross-Defendant Cantor Group IV, LLC's Opposition to Motion to Compel Arbitration and Stay Proceedings Filed by Defendant and Cross-Complainants* filed in the Superior Court of the State of California for the County of Orange, Central Justice Center, and dated as of November 9, 2023.

10. Attached hereto as Exhibit 7 is a true and correct copy of the Minute Order entered by the Honorable David J. Hesseltine of the Superior Court of the State of California for the County of Orange, Central Justice Center on November 8, 2023.

11. Attached hereto as Exhibit 8 is a true and correct copy of the Statement of Information for Vierergruppe Management filed with the Office of the Secretary of State of the State of California on October 8, 2024, File No. BA20241793984.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: March 13, 2025

DocuSigned by:

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Mohammad Honarkar